

UNITED STATES DISTRICT COURT
DISTRICT OF COLUMBIA

M -07-1185

- - - - -X

UNITED STATES OF AMERICA

- against -

ANTONIO JONES, also known as
"Ralph Johnson,"
"Michael Johnson,"
"Anthony Johnson,"
"Tony Johnson"
"Ray Jones,"
"Anthony Little," and
"Ton,"

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

JEFFREY D. MARKHEIM, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

Upon information and belief, there is probable cause to believe that in or about and between June 2007 and July 2007, within the Eastern District of New York and elsewhere, ANTONIO JONES, also known as "Ralph Johnson," "Michael Johnson," "Anthony Johnson," "Tony Johnson," "Ray Jones," "Anthony Little," and "Ton," did knowingly and wilfully conspire to recruit, entice, harbor, transport, provide and obtain by any means a person in and affecting interstate commerce, and to benefit financially from participation in a venture engaged in such acts, knowing

SEALED AFFIDAVIT
IN SUPPORT OF
WARRANT FOR ARREST

(18 U.S.C. §§ 2,
1591(a)(1), 1591(a)(2),
1594(a), 2422(a), and
2423(a))

that the person had not attained the age of 18 years and that the person would be caused to engage in a commercial sex act.

(Title 18, United States Code, Section 1594(a)).

Upon information and belief, there is probable cause to believe that in or about and between June 2007 and July 2007, within the Eastern District of New York and elsewhere, ANTONIO JONES, also known as "Ralph Johnson," "Michael Johnson," "Anthony Johnson," "Tony Johnson," "Ray Jones," "Anthony Little," and "Ton," did knowingly and intentionally recruit, entice, harbor, transport, provide and obtain by any means a person in and affecting interstate commerce, and did knowingly and intentionally benefit financially from participation in a venture engaged in such acts, knowing that the person had not attained the age of 18 years and that the person would be caused to engage in a commercial sex act.

(Title 18, United States Code, Sections 2, 1591(a)(1) and 1591(a)(2)) .

Upon information and belief, there is probable cause to believe that in or about June 2007 and July 2007, within the Eastern District of New York and elsewhere, the defendant ANTONIO JONES, also known as "Ralph Johnson," "Michael Johnson," "Anthony Johnson," "Tony Johnson," "Ray Jones," "Anthony Little," and "Ton," did knowingly and intentionally transport an individual

who had not attained the age of 18 years in interstate commerce, with intent that the individual engage in prostitution.

(Title 18, United States Code, Section 2423(a)).

Upon information and belief, there is probable cause to believe that in or about June 2007 and July 2007, within the Eastern District of New York and elsewhere, the defendant ANTONIO JONES, also known as "Ralph Johnson," "Michael Johnson," "Anthony Johnson," "Tony Johnson," "Ray Jones," "Anthony Little," and "Ton," did knowingly and intentionally persuade, induce, entice and coerce an individual to travel in interstate commerce to engage in prostitution.

(Title 18, United States Code, Section 2422(a)).

The source of your deponent's information and the grounds for his belief are as follows:^{1/}

Introduction

1. I have been a Special Agent with the Federal Bureau of Investigation ("FBI") for approximately 4-1/2 years. Since November 2003, I have been assigned to the New York Field Office's civil rights squad, which investigates, among other things, the sexual exploitation of children. I am the case agent in this matter and am familiar with the facts of this case

^{1/} Because the purpose of this Affidavit is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware. In addition, when I rely on statements made by others, such statements are set forth in part and in substance unless otherwise indicated.

through my interviews of witnesses, review of records and discussions with other law enforcement officers.

Probable Cause

The Victim

2. On or about July 20, 2007, I interviewed an 11-year-old girl (the "Victim") following her detention by Port Authority police as a possible run-away. At the time she was stopped at the Port Authority bus terminal in Manhattan, the Victim was returning to Brooklyn, New York from Washington, D.C. During the interview, the Victim told me, in part and substance, that: (i) she had been working as a prostitute for about the past month in the Washington, D.C. area, with a woman known as "Star," whom the Victim believed to be in her early 20s; (ii) the Victim and Star advertised their services and made "dates" through the Internet, using a laptop computer with which they traveled; (iii) her last pimp was an adult male known as "Tone;"^{2/} and (iv) she had worked as a prostitute as recently as the day before in Manassas Virginia and that Star had worked in College Park, Maryland that day. The Victim told me that "Tone" had a tattoo with two faces, one happy and the other sad, and explained that

² The spelling of "Tone" is phonetic and based on the Victim's pronunciation of the name. While the Victim did not specifically identify Tone as her "pimp," she indicated that Tone was her most recent "boyfriend," and that she called her boyfriends "Daddy." Based on my knowledge and experience, I am aware that prostitutes frequently use the term "Daddy" to refer to their pimps.

it meant that one should "cry now so that you can be happy later." The Victim provided cellular telephone numbers that she and Star, individually, had used in connection with the prostitution business.

3. Postings by the Victim on Myspace.com confirmed that she had traveled from Brooklyn, New York to Virginia Beach, Virginia on or about June 24, 2007, and that thereafter she traveled throughout the Washington, D.C. area.

4. A search of the Internet revealed numerous advertisements posted on Craigslist, in the Washington D.C. "Erotic Services" section, containing the Victim's cellular telephone number and various provocative photographs of young women and girls. Information subpoenaed from Craigslist confirmed that these advertisements had been posted from hotels in and around the Washington, D.C. area, including D.C., Maryland and Virginia. Numerous prostitution advertisements containing Star's cellphone number were posted on Craigslist from the same hotels where the Victim had posted her ads and around the same time as the Victim's postings, thus tending to confirm that the Victim and Star stayed at the same hotel throughout most of the time that the Victim was in the D.C. area.^{3/} These postings also

³ Hotel guest registration and telephone records further tended to establish that the Victim and Star had roomed together at these hotels. For example, a telephone call was made to the Victim's aunt from a room registered to Star.

corroborated the Victim's statement that on July 19, she was in Manassas, Virginia while Star was in College Park, Maryland.

5. Based on my observation of and interaction with the Victim on July 20, I believe she looks like a minor who is substantially under 18 years of age. During the interview, she also exhibited certain child-like behavior, such as asking for candy and drawing pictures of one of the agents.

The Defendant's Delaware Arrest

6. On or about September 26, 2006, the defendant was charged, under his true name Antonio Jones, with producing child pornography based on his possession of a laptop containing Craigslist postings that advertised the sexual services of a 17-year-old female ("Delaware Victim") and contained sexually explicit photographs of the Delaware Victim, who was with the defendant at the time of his arrest.

7. According to the complaint in that case, the defendant had recruited the Delaware Victim in Georgia and flown with her from Georgia to New York, as well as paid for her transportation. The defendant thereafter transported her to Pennsylvania, where she was photographed for the Craigslist advertisements, and then brought her to Delaware. One of the other individuals arrested with the defendant in Delaware identified the defendant as "Ton,"⁴ which presumably is short for

⁴ This spelling is from the Delaware police records.

Antonio. The defendant pled guilty to promoting prostitution in the second degree and possession of child pornography and was sentenced to time served. In the Delaware sex offender registry, the defendant's home address is listed as 240 Workman Avenue, Brooklyn, New York.

Defendant's Involvement with the Victim

8. Staff at one of the D.C. area hotels at which the Victim had stayed identified both the Victim and the defendant as having been frequent guests or visitors at the hotel around the same time. One staff member also observed the Victim socializing with the defendant and his male associates in the hotel's public area.

9. Beginning in or about July 2007, advertisements containing Star's telephone number and a provocative photograph of a young woman were posted in the Village Voice online adult entertainment classifieds section for the New York City area. The advertisements were set to repost at regular intervals. The credit card used to pay for the advertisements is in the defendant's true name, Antonio Jones, with a Brooklyn address.^{5/} The credit card was purchased in a Walgreens in Brooklyn.^{6/}

⁵ The defendant provided the home address of 22 Lewis Avenue, Apt. 6D, Brooklyn, New York, and the contact number (347) 598-5312.

⁶ The type of credit card used by the defendant is a prepaid debit card that is typically sold at drugstores and convenience stores.

10. The same photograph used in Star's Village Voice advertisement was used for a Craigslist advertisement for the Victim on July 19, 2007.⁷

Interview of a Customer

11. On or about October 16, 2007, I interviewed one of the Victim's adult male customers. The customer admitted, in part and substance, that he had had sexual intercourse with the Victim on two occasions between July 17 and 19, 2007, and that he believed her to be around 15 years old because of her overall appearance, underdeveloped anatomy and immature behavior and demeanor.

12. Telephone records show eight calls between the customer and the Victim's cellphone between July 18, 10:17 p.m., and July 19, 12:28 a.m., followed approximately 10 minutes later by four calls to the customer's cellphone from (347) 598-5312, which is the number used by the defendant to obtain the credit card referenced in Paragraph 9, but is subscribed to under the name of Anthony Little (the "Defendant's Phone"). When asked by the calls from the Defendant's Phone, the customer indicated that he believed those calls were made by the Victim.

⁷ Notably, the photograph in the advertisement is of a woman who is not the Victim and appears older than the Victim.

13. The Defendant's Phone was used in an advertisement on Craigslist for "Triple Threat Entertainment," which contained the following solicitation:

LOOKING FOR FEMALES THAT ABOUT THAT CASH
WE TRAVEL AROUND WHERE THE MONEY AT.
STATE TO STATE, EVERYTHING SAFE AND PROTECTED
YOU WILL NEVER HAVE A WANT OR A WORRY AGAIN
IN LIFE
SO IF YOU IN NEED OF A HELPING HAND THIS IS
THE RIGHT SPOT FOR YOU LADIES.....

14. The subscriber information for the Defendant's Phone identifies a home address of 240 Workman Avenue, Brooklyn, New York.^{8/}

15. On July 19, after being told by the Victim that her pimp had hit her, the customer assisted the Victim in returning to Brooklyn by buying her a bus ticket and taking her to the bus station. As he was driving her to the station, he received a call on his cellphone from a male who said, in substance, that the customer was "playing with fire," and that the caller was going to kill the customer. The threatening call came from (347) 661-2366, which is the number subscribed to by a male visually identified by the D.C. area hotel staff as one of the defendant's associates ("Associate 1 Phone"). The home

⁸ Based on other information obtained through the investigation, I believe that the defendant's real address is 22 Lewis Avenue in Brooklyn, but that he frequently uses the false address of 240 Workman, which, as discussed below, is similar to the address of one of his associates.

address for that cellphone account is 240 Wortman Avenue, Brooklyn, New York.⁹

16. The contacts list in the Victim's cellphone contains: (1) the Defendant's Phone number, identified as "Daddy;" and (2) the Associate 1 Phone, identified as "Daddy 2."

The Defendant's Current Incarceration

17. The defendant currently is in custody, under the alias "Ralph Johnson," at the Riker's Island facility pending his extradition to Delaware for violation of probation stemming from his September 2006 arrest and conviction. According to Riker's Island staff, the defendant has a tattoo on his arm of two faces, one happy and another sad.

18. The defendant's criminal history indicates, in part, the following:


a. On or about June 27, 2007, the defendant was arrested under the alias, "Michael Johnson," for possession of marijuana in the parking lot of a hotel in Manassas, Virginia; and

b. In addition to the aliases identified above, the defendant has also used the names "Anthony Johnson," "Tony Johnson" and "Ray Jones."

⁹ There is no Workman Avenue in Brooklyn; however, there is a Wortman Avenue.

19. Based on the information set forth herein and other information obtained through the investigation, as well as my experience and training, I believe that the defendant and several associates are prostituting young women, some of whom are minors, in several states, including New York, Delaware, Maryland, Virginia and Washington, D.C., and that the defendant and his associates recruit these women from various places, including New York, through the Internet and other means, to work for them, and then transport or arrange for them to be transported to other states to work.

WHEREFORE, your deponent respectfully requests that a warrant issue for the arrest of the defendant ANTONIO JONES, also known as "Ralph Johnson," "Michael Johnson," "Anthony Johnson," "Tony Johnson," "Ray Jones" and "Ton," so that he may be dealt with according to law, and that this Affidavit and the warrant be sealed to prevent the flight of the defendant and destruction of evidence.



Jeffrey D. Markheim
Special Agent
Federal Bureau of Investigation

Sworn to before me this
6 day of October, 2007

~~UNITED STATES~~ MAGISTRATE JUDGE
EASTERN ~~DISTRICT~~ OF NEW YORK